REMARKS

Claim 2 is canceled herein. Claims 1 and 3-61 now remain pending in the application.

Objection of Claim 2

Claim 2 was objected to for allegedly lacking antecedent basis for "said SNTL".

Claim 2 is canceled herein making the objection of claim 2 now moot.

Claims 1, 3-10, 15 and 17-61 over Gleeson in view of Dunlop

In the Office Action, claims 1-10, 15 and 17-47 were rejected under 35 U.S.C. §102(b) as allegedly being obvious over U.S. Patent No. 5,446,736 to Gleeson et al. ("Gleeson") in view of U.S. Patent No. 6,721,872 to Dunlop et al. ("Dunlop"). The Applicants respectfully traverse the rejection.

Claim 2 is canceled herein, making the rejection of claim 2 now moot.

Claims 1, 3-10, 15 and 17-61 recite a protocol gateway to **encapsulate** a fundamental network protocol underlining each of one or more wireless network protocols.

The Examiner acknowledged that Gleeson fails to disclose "a protocol gateway to encapsulate a fundamental network protocol." (see Office Action, page 4). However, the Examiner relies on a Dunlop to allegedly make up for the acknowledged deficiencies in Gleeson to arrive at the claimed features. The Applicants respectfully disagree.

The Examiner alleged that Dunlop discloses use of a reconfigurable network interface architecture including a device to support network operating protocols and an OSI protocol stack at col. 3, lines 14-34 and col. 4, lines 5-15 (see Office Action, page 4). However, the Examiner has failed to show how Dunlop makes up for the acknowledged deficiency in Gleeson that fails to use **encapsulation**, i.e., "a protocol gateway to **encapsulate** a fundamental network protocol." Thus, even if Dunlop discloses use of a reconfigurable network

interface architecture including a device to support network operating protocols and an OSI protocol stack the Examiner has not shown Dunlop, nor any other cited prior art reference discloses use of encapsulation for any reason, much less a protocol gateway to **encapsulate** a fundamental network protocol underlining each of one or more wireless network protocols, as recited by claims 1, 3-10, 15 and 17-61.

Moreover, claims 1, 3-10, 15 and 17-61 recite a **protocol gateway** to encapsulate a fundamental network protocol underlining each of one or more wireless network protocols.

As discussed above, the Examiner acknowledged that Gleeson fails to disclose "a protocol gateway to encapsulate a fundamental network protocol." (see Office Action, page 4). However, the Examiner relies on a Dunlop to allegedly make up for the acknowledged deficiencies in Gleeson to arrive at the claimed features. The Applicants respectfully disagree.

The Examiner alleged that Dunlop discloses use of a reconfigurable network interface architecture including a device to support network operating protocols and an OSI protocol stack at col. 3, lines 14-34 and col. 4, lines 5-15 (see Office Action, page 4). However, the Examiner has failed to show how Dunlop makes up for the acknowledged deficiency in Gleeson that fails to use a **protocol gateway** to perform encapsulation, i.e., "a **protocol gateway** to encapsulate a fundamental network protocol." Thus, even if Dunlop discloses use of a reconfigurable network interface architecture including a device to support network operating protocols and an OSI protocol stack the Examiner has not shown Dunlop, nor any other prior art reference discloses the use of a **protocol gateway** to perform any type of encapsulation, much less a **protocol gateway** to encapsulate a fundamental network protocol underlining each of one or more wireless network protocols, as recited by claims 1, 3-10, 15 and 17-61.

Moreover, the Examiner alleged that it would have been obvious to modify Gleeson with the disclosure of Dunlop because "it is efficient for communication to have a device that supports different protocols" at disclosed at col. 2, lines 13-19. However, Gleeson's invention is directed toward a connection of a WAN 100 to an enterprise network 102 (see Fig. 1). Gleeson fails to

disclose connection of devices using different protocols and therefore would have no purpose for use of a protocol gateway. Thus, the Examiner's modification of Gleeson is nonsensical. The Examiner would first have to modify Gleeson to use a plurality of device using different protocols, which is unrelated to Gleeson's invention and again would be a nonsensical modification of Gleenson.

Thus, Gleeson in view of Dunlop fails to disclose, teach or suggest a **protocol gateway** to **encapsulate** a fundamental network protocol underlining each of one or more wireless network protocols, as recited by claims 1, 3-10, 15 and 17-61.

Accordingly, for at least all the above reasons, claims 1, 3-10, 15 and 17-61 are patentable over the prior art of record. It is therefore respectfully requested that the rejection be withdrawn.

Claims 11-14 and 16 over Gleeson in view of Dunlop and Meyer

In the Office Action, claims 11-14 and 16 were rejected under 35 U.S.C. §103(a) as allegedly being obvious over Gleeson in view of Dunlop, and further in view of U.S. Patent No. 6,778,099 to Meyer et al. ("Meyer"). The Applicants respectfully traverse the rejection.

Claims 11-14 and 16 recite a protocol gateway to **encapsulate** a fundamental network protocol underlining each of one or more wireless network protocols.

As discussed above, the Gleeson in view of Dunlop fails to disclose or suggest a protocol gateway to **encapsulate** a fundamental network protocol underlining each of one or more wireless network protocols, as recited by claims 11-14 and 16.

The Examiner relies on Meyers to allegedly make up for the deficiencies in Gleeson to arrive at the claimed features. The Applicants respectfully disagree.

Meyers' invention is directed toward a communications module that permits remote meter reading of a utility meter. However, Meyers' invention lacks any application to communications that occur over a plurality of wireless networks. Meyers fails to disclose or suggest use of a protocol gateway, much

less a protocol stack and use of any type of encapsulation, as recited by claims 11-14 and 16.
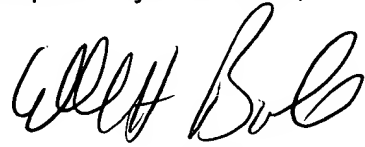
Thus, theoretically modifying Gleeson with Dunlop and Meyer, besides being nonsensical as discussed above, would still fail to disclose or suggest a protocol gateway to **encapsulate** a fundamental network protocol underlining each of one or more wireless network protocols, as recited by claims 11-14 and 16.

Accordingly, for at least all the above reasons, claims 11-14 and 16 are patentable over the prior art of record. It is therefore respectfully requested that the rejection be withdrawn.

Conclusion

All objections and rejections having been addressed, it is respectfully submitted that the subject application is in condition for allowance and a Notice to that effect is earnestly solicited.

Respectfully submitted,

William H. Bollman
Reg. No. 36,457

Manelli Denison & Selter PLLC
2000 M Street, NW
Suite 700
Washington, DC 20036-3307
TEL. (202) 261-1020
FAX. (202) 887-0336
WHB/df